

EXHIBIT A

Megan Benett

From: Megan Benett
Sent: Wednesday, August 18, 2021 6:52 PM
To: 'Rapawy, Gregory G.'
Cc: Steven R. Pounian; Jim Kreindler; Andrew J. Maloney; scarter1@cozen.com; zScott Tarbutton; zJodi W. Flowers; zRobert Haefeale; Goldman, Jerry; 'bstrong@andersonkill.com'; zSarah S. Normand; Vargas, Jeannette; Kellogg, Michael K.; rkry@mololamken.com; 'Nitz, Eric'; Shen, Andrew C.
Subject: RE: In re Terrorist Attacks on September 11, 2001, No. 1:03-md-01570-GBD-SN

Hi Greg –

We disagree with the content of your response and unless you see any likelihood of changing your position we agree with your statement that we are at an impasse and that the parties should address this with the Court.

We ask that in your filing you note that we object to your proposed redactions and will provide our reasons to the Court separately.

Best
Megan

From: Rapawy, Gregory G. [mailto:grapawy@kellogghansen.com]
Sent: Wednesday, August 18, 2021 5:34 PM
To: Megan Benett <Mbenett@kreindler.com>
Cc: Steven R. Pounian <Spounian@kreindler.com>; Jim Kreindler <JKreindler@kreindler.com>; Andrew J. Maloney <AMaloney@kreindler.com>; scarter1@cozen.com; zScott Tarbutton <starbutton@cozen.com>; zJodi W. Flowers <jflowers@motleyrice.com>; zRobert Haefeale <rhaefeale@motleyrice.com>; Goldman, Jerry <jgoldman@andersonkill.com>; 'bstrong@andersonkill.com' <bstrong@andersonkill.com>; zSarah S. Normand <sarah.normand@usdoj.gov>; Vargas, Jeannette <jeannette.vargas@usdoj.gov>; Kellogg, Michael K. <mkellogg@kellogghansen.com>; rkry@mololamken.com; 'Nitz, Eric' <enitz@mololamken.com>; Shen, Andrew C. <ashen@kellogghansen.com>
Subject: RE: In re Terrorist Attacks on September 11, 2001, No. 1:03-md-01570-GBD-SN

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Megan,

Thanks for your response. We disagree with your position and with your characterization of Al Jarrah's testimony. [REDACTED]

[REDACTED] If
Plaintiffs believe a telephonic meet-and-confer on this issue would be productive, please let us know your availability. Otherwise, we understand that the parties are at impasse and will move the court for approval of our proposed redactions.

Regards,

Greg

From: Megan Benett <Mbenett@kreindler.com>
Sent: Wednesday, August 18, 2021 4:52 PM
To: Rapawy, Gregory G. <grapawy@kellogghansen.com>
Cc: Steven R. Pounian <Spounian@kreindler.com>; Kreindler, James <jkreindler@kreindler.com>; Maloney, III, Andrew

<amaloney@kreindler.com>; <scarter1@cozen.com>; Tarbuton, Joseph <starbutton@cozen.com>; zJodi W. Flowers <jflowers@motleyrice.com>; zRobert Haefeale <rhaefeale@motleyrice.com>; Goldman, Jerry <jgoldman@andersonkill.com>; 'bstrong@andersonkill.com' <bstrong@andersonkill.com>; zSarah S. Normand <sarah.normand@usdoj.gov>; Vargas, Jeannette <jeannette.vargas@usdoj.gov>; Kellogg, Michael K. <mkellogg@kellogghansen.com>; <rkry@mololamken.com>; 'Nitz, Eric' <enitz@mololamken.com>; Shen, Andrew C. <ashen@kellogghansen.com>

Subject: [EXTERNAL] RE: In re Terrorist Attacks on September 11, 2001, No. 1:03-md-01570-GBD-SN

Greg –

We do not agree that the proposed redactions to Exhibit B at pages 8 – 10 and 42 – 66 of the transcript nor the proposed redactions to the letter-motion are appropriate. The information you redacted is not subject to any protective order and to the extent the Kingdom has standing to assert any privacy interest on the part of Jarrah, that [REDACTED] [REDACTED] may be an embarrassment to him is not a reasonable basis to seal those portions of the letter-motion and exhibit.

We are fine with your other redactions.

Best
Megan

Megan Benett
Partner

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From: Rapawy, Gregory G. [<mailto:grapawy@kellogghansen.com>]

Sent: Tuesday, August 17, 2021 8:38 PM

To: Steven R. Pounian <Spounian@kreindler.com>; zJodi W. Flowers <jflowers@motleyrice.com>; zRobert Haefeale <rhaefeale@motleyrice.com>; Jim Kreindler <JKreindler@kreindler.com>; Andrew J. Maloney <AMaloney@kreindler.com>; Megan Benett <Mbenett@kreindler.com>; <scarter1@cozen.com>; zScott Tarbuton <starbutton@cozen.com>; Goldman, Jerry <jgoldman@andersonkill.com>; 'bstrong@andersonkill.com' <bstrong@andersonkill.com>; zSarah S. Normand <sarah.normand@usdoj.gov>; Vargas, Jeannette <jeannette.vargas@usdoj.gov>; <rkry@mololamken.com>; 'Nitz, Eric' <enitz@mololamken.com>

Cc: Kellogg, Michael K. <mkellogg@kellogghansen.com>; Shen, Andrew C. <ashen@kellogghansen.com>

Subject: In re Terrorist Attacks on September 11, 2001, No. 1:03-md-01570-GBD-SN

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ATTACHMENTS SUBJECT TO MDL PROTECTIVE ORDER

Counsel,

Judge Netburn's order last Thursday directs "the parties . . . to file their applications on the public record with whatever limited redactions, if any, are required by the Protective Order and FBI Protective Order." ECF No. 7011, at 3.

In light of the Court's order, Saudi Arabia has reviewed the parties' filings in this motion sequence and proposes limited redactions for MDL protected information to its letter-motion to enforce the protective order (ECF No. 6981) and Exhibit B to that order (ECF No. 6981-2). Those redactions are highlighted in yellow in the attached version of the filings. Saudi Arabia does not propose any redactions for MDL protected information to any other documents in this motion sequence.

Please let us know if anyone would like to meet and confer concerning these proposed redactions. If not, we will proceed to file in accordance with the Court's order.

Sarah and Jeannette, I think all of KSA's filings in this sequence have already been reviewed by the FBI and that the FBI has determined not to request any redactions. But if the FBI would prefer to review anything again before we proceed with the public filing, please let me know. We did notice that there is one FBI Bates number at the second-to-last page of Exhibit B (transcript page 596, line 22), and I think those have been redacted in previous filings.

Regards,

Greg

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